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*Counsel for Defendants*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

JUNHAN JEONG, individually and on behalf  
of all others similarly situated,

Plaintiff,

vs.

NEXO FINANCIAL LLC, NEXO  
FINANCIAL SERVICES LTD., NEXO  
SERVICES OÜ, NEXO AG, and NEXO  
CAPITAL INC.

Defendant(s).

) Case Number: 5:21-CV-02392-BLF

) **JOINT STIPULATION AND**  
) **[PROPOSED] ORDER**

STIPULATION  
Case No. 5:21-CV-02392-BLF

1 Plaintiff Junhan Jeong, individually and on behalf of all others similarly situated, and  
2 Defendants Nexo Financial LLC, Nexo Financial Services Ltd., Nexo Services OÜ, Nexo AG,  
3 and Nexo Capital Inc. (collectively, “Defendants”), by and through their undersigned counsel,  
4 hereby stipulate as follows:

5 WHEREAS, on August 27, 2021, the Court ordered that “[t]he deadline for the parties to  
6 meet and confer, and submit a stipulation and order setting all deadlines not set by the Court  
7 below, including discovery cut-offs and expert disclosure deadlines, is September 10, 2021”  
8 (Dkt. No. 32);

9 WHEREAS, the parties have accordingly met and conferred regarding proposed  
10 deadlines not yet set by the Court;

11 IT IS ACCORDINGLY HEREBY STIPULATED AND AGREED, by and between the  
12 undersigned counsel for Plaintiff and Defendants, subject to the Court’s approval, as follows:

- 13 1. Provided that all fact discovery relating to class certification is completed by the date  
14 set forth in paragraph 3 below, the parties may serve written discovery relating to class  
15 certification, including requests for production of documents, interrogatories, and  
16 requests to admit, at any time after the Court’s ruling on Defendants’ motion to dismiss,  
17 provided that one or more of Plaintiff’s claims survive.
- 18 2. The parties will make expert disclosures relating to class certification identifying the  
19 name, producing the CV, and describing the general subject matter of the expert  
20 testimony, on or before May 10, 2022. These expert disclosures do not apply to rebuttal  
21 experts.
- 22 3. The parties will complete fact discovery relating to class certification on or before June  
23 10, 2022.
- 24 4. The parties will serve expert reports relating to class certification on or before June 10,  
25 2022.

5. The parties will disclose rebuttal experts and serve rebuttal expert reports relating to class certification on or before July 15, 2022.
6. The parties will complete expert discovery relating to class certification on or before July 29, 2022.
7. Plaintiff will file any motion for class certification on or before August 12, 2022 (this deadline was already set by the Court, but is included again here for purposes of completeness).
8. Provided that all fact discovery relating to merits is completed by the date set forth in paragraph 10 below, the parties may serve written discovery relating to merits, including requests for production of documents, interrogatories, and requests to admit, at any time after the Court's ruling on Plaintiff's motion for class certification, provided that the motion is granted in whole or part.
9. The parties will make expert disclosures relating to merits identifying the name, producing the CV, and describing the general subject matter of the expert testimony, on or before February 3, 2023. These expert disclosures do not apply to rebuttal experts.
10. The parties will complete fact discovery relating to merits on or before March 3, 2023.
11. The parties will serve expert reports relating to merits on or before March 3, 2023.
12. The parties will disclose rebuttal experts and serve rebuttal expert reports relating to merits on or before April 7, 2023.
13. The parties will complete expert discovery relating to merits on or before April 21, 2023.
14. The parties will file any dispositive motions on or before May 5, 2023.
15. Any dispositive motions will be heard on or before August 3, 2023, at 9:00 a.m. (this deadline was already set by the Court, but is included again here for purposes of completeness).

1  
2  
3  
4 Dated: September 10, 2021

5 /s/ Ian Shelton  
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11 *Counsel for Defendants*

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11 *Counsel for Plaintiff*

12 PURSUANT TO STIPULATION, IT IS SO ORDERED:

13  
14 Dated: Sept. 10, 2021

15   
16 Hon. Beth Labson Freeman